

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK (SKAT) TAX
REFUND SCHEME LITIGATION

This document relates to All Cases.

MASTER DOCKET

18-md-2865 (LAK)

**MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL
ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK**

PLEASE TAKE NOTICE that the undersigned attorneys for the plaintiff SKAT, the Customs and Tax Administration of the Kingdom of Denmark, will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United State Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request for International Judicial Assistance Pursuant to the Hague Convention on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, SKAT relies upon the accompanying Memorandum of Law and Declaration of Sarah L. Cave dated November 30, 2018 and the exhibits attached thereto.

Dated: New York, New York
November 30, 2018

HUGHES HUBBARD & REED LLP

By: /s/ Sarah L. Cave
William R. Maguire
Marc A. Weinstein
Sarah L. Cave
John T. McGoey
One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
bill.maguire@hugheshubbard.com
marc.weinstein@hugheshubbard.com
sarah.cave@hugheshubbard.com
john.mcgoey@hugheshubbard.com

*Counsel for Plaintiff SKAT (Customs and Tax
Administration of the Kingdom of Denmark)*